

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION**

DANIEL NOTESTEIN, BLOCKTRADES
INTERNATIONAL, LTD., ANDREW
CHANEY, SZYMON LAPINSKI, ADAM
DODSON, ELMER LIN, DANIEL HENSLEY,
MICHAEL WOLF, MATHIEU GAGNON, and
MARTIN LEES,

Plaintiffs/Counter-
Defendants,

v.

Civil Action No. 7:20CV00342

BITTREX, INC.,

Defendant/Counter-
Plaintiff

J. DOES, and

Defendants

STEEMIT, INC.

Third-Party
Defendant

INTERPLEADER BOND NO. SU1181409

Defendant/Interpleader Plaintiff Bittrex, Inc. ("Bittrex") has commenced an action for interpleader in the above-entitled Court, impleading the following adverse claimants: (1) Plaintiffs Daniel Notestein, Blocktrades International, Ltd., Andrew Chaney, Szymon Lapinski, Adam Dodson, Elmer Lin, Daniel Hensley, Michael Wolf, Mathieu Gagnon, and Martin Lees (collectively, the "Notestein Plaintiffs"; and (2) Third-Party Defendant Steemit Inc. ("Steemit"). The Notestein Plaintiffs, on the one hand, and Steemit, on the other, assert adverse title to cryptocurrency with an approximate value of \$3,940,276.70 (the "Disputed Cryptocurrency"). The Disputed Cryptocurrency is currently held by Bittrex.

Pursuant to 28 U.S.C. § 1335(a)(2), Bittrex, as Principal, and Arch Insurance Company, as Surety, hereby jointly and severally bind themselves to the Court in the maximum aggregate penal sum of \$3,940,276.70 to secure performance in conformity with any final ruling by the Court regarding the disposition of the Disputed Cryptocurrency.

This obligation will remain in force and effect until such time as Bittrex shall comply with the future order or judgment of the Court with respect to the subject matter in controversy in this action, and on such compliance this obligation shall be void.

Written notice of any claim on this surety bond shall be sent to the following:

Wells Fargo Place, 30 E. 7th Street, #2270, St. Paul, MN 55101, USA;
Attn: Chris Bolla cbolla@archinsurance.com
(651) 855-7100

Signed this April day of 8th, 2022.

Principal: Bittrex, Inc.

By: 

Its:

Authorized Representative

Signed this 1st day of April, 2022

Surety: Arch Insurance Company

By: 

Its:

Marina Tapia, Attorney-in-Fact

Approved this ____ day of _____, 20__.

WOODS ROGERS PLC
ATTORNEYS AT LAW

[]
[U.S. District Court Judge]
Or
[]
[Court Clerk]

DATED this 8th day of April, 2022.

Respectfully submitted,

WOODS ROGERS PLC

By: s/ J. Benjamin Rottenborn

J. Benjamin Rottenborn (VSB No. 84796)
10 South Jefferson Street, Suite 1400
Roanoke, Virginia 24011
Phone: (540) 983-7540
brottenborn@woodsrogers.com

AND

McNAUL EBEL NAWROT & HELGREN PLLC

Gregory J. Hollon, *Pro Hac Vice*
Claire Martirosian, *Pro Hac Vice*
600 University Street, Suite 2700
Seattle, Washington 98101
Phone: (206) 467-1816
ghollon@mcnaul.com
cmartirosian@mcnaul.com

Counsel for Defendant Bittrex, Inc.

WOODS ROGERS PLC
ATTORNEYS AT LAW

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the foregoing was served via the CM/ECF system on the individuals listed below on April 8, 2022:

Paul Graham Beers
Glenn Feldmann Darby & Goodlatte
37 Campbell Avenue, S.W.
Roanoke, VA 24011
540-224-8035
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Attorneys for Plaintiffs

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Attorneys for Third-Party Defendant Steemit, Inc.

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540-983-9373
Email: finney@gentrylocke.com
Attorneys for Third-Party Defendant Steemit, Inc.

By: s/ Gregory J. Hollon
Gregory J. Hollon, *Pro Hac Vice*
Attorneys for Defendant Bittrex, Inc.

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

A Notary Public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Los Angeles

On APR 01 2022 before me, Edward C. Spector, Notary Public, personally appeared Marina Tapia who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledgment to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

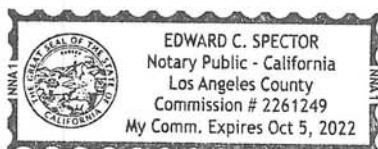
I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

Witness my hand and official seal.

Signature



Edward C. Spector, Notary Public



This Power of Attorney limits the acts of those named herein, and they have no authority to bind the Company except in the manner and to the extent herein stated. Not valid for Note, Loan, Letter of Credit, Currency Rate, Interest Rate or Residential Value Guarantees.

POWER OF ATTORNEY

Know All Persons By These Presents:

That the Arch Insurance Company, a corporation organized and existing under the laws of the State of Missouri, having its principal administrative office in Jersey City, New Jersey (hereinafter referred to as the "Company") does hereby appoint:

Adriana Valenzuela, B. Aleman, D. Garcia, Edward C. Spector, Erin Brown, Ethan Spector, Janina Monroe, Jennifer Ochs, KD Wapato, Marina Tapia, Simone Gerhard and Timothy J. Noonan of Los Angeles, CA (EACH)

its true and lawful Attorney(s) in-Fact, to make, execute, seal, and deliver from the date of issuance of this power for and on its behalf as surety, and as its act and deed: Any and all bonds, undertakings, recognizances and other surety obligations, in the penal sum not exceeding Ninety Million Dollars (\$90,000,000.00). This authority does not permit the same obligation to be split into two or more bonds. In order to bring each such bond within the dollar limit of authority as set forth herein.

The execution of such bonds, undertakings, recognizances and other surety obligations in pursuance of these presents shall be as binding upon the said Company as fully and amply to all intents and purposes, as if the same had been duly executed and acknowledged by its regularly elected officers at its principal administrative office in Jersey City, New Jersey.

This Power of Attorney is executed by authority of resolutions adopted by unanimous consent of the Board of Directors of the Company on December 11, 2020, true and accurate copies of which are hereinafter set forth and are hereby certified to by the undersigned Secretary as being in full force and effect:

"VOTED, That the Chairman of the Board, the President, or the Executive Vice President, or any Senior Vice President, of the Surety Business Division, or their appointees designated in writing and filed with the Secretary, or the Secretary shall have the power and authority to appoint agents and attorneys-in-fact, and to authorize them subject to the limitations set forth in their respective powers of attorney, to execute on behalf of the Company, and attach the seal of the Company thereto, bonds, undertakings, recognizances and other surety obligations obligatory in the nature thereof, and any such officers of the Company may appoint agents for acceptance of process."

This Power of Attorney is signed, sealed and certified by facsimile under and by authority of the following resolution adopted by the unanimous consent of the Board of Directors of the Company on December 11, 2020:

VOTED, That the signature of the Chairman of the Board, the President, or the Executive Vice President, or any Senior Vice President, of the Surety Business Division, or their appointees designated in writing and filed with the Secretary, and the signature of the Secretary, the seal of the Company, and certifications by the Secretary, may be affixed by facsimile on any power of attorney or bond executed pursuant to the resolution adopted by the Board of Directors on December 11, 2020, and any such power so executed, sealed and certified with respect to any bond or undertaking to which it is attached, shall continue to be valid and binding upon the Company. In Testimony Whereof, the Company has caused this instrument to be signed and its corporate seal to be affixed by their authorized officers, this 22nd day of February, 2022

Attested and Certified

Reg A. Shulman

Regan A. Shulman, Secretary



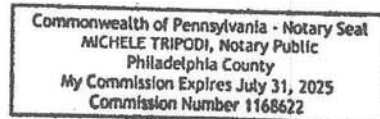
Arch Insurance Company

Stephen C. Ruschak

Stephen C. Ruschak, Executive Vice President

STATE OF PENNSYLVANIA SS
COUNTY OF PHILADELPHIA SS

I, Michele Tripodi, a Notary Public, do hereby certify that Regan A. Shulman and Stephen C. Ruschak personally known to me to be the same persons whose names are respectively as Secretary and Executive Vice President of the Arch Insurance Company, a Corporation organized and existing under the laws of the State of Missouri, subscribed to the foregoing instrument, appeared before me this day in person and severally acknowledged that they being thereunto duly authorized signed, sealed with the corporate seal and delivered the said instrument as the free and voluntary act of said corporation and as their own free and voluntary acts for the uses and purposes therein set forth.



Michele Tripodi

Michele Tripodi, Notary Public
My commission expires 07/31/2025

CERTIFICATION

I, Regan A. Shulman, Secretary of the Arch Insurance Company, do hereby certify that the attached Power of Attorney dated February 22, 2022 on behalf of the person(s) as listed above is a true and correct copy and that the same has been in full force and effect since the date thereof and is in full force and effect on the date of this certificate; and I do further certify that the said Stephen C. Ruschak, who executed the Power of Attorney as Executive Vice President, was on the date of execution of the attached Power of Attorney the duly elected Executive Vice President of the Arch Insurance Company.

IN TESTIMONY WHEREOF, I have hereunto subscribed my name and affixed the corporate seal of the Arch Insurance Company on this 1st day of April, 2022.

Reg A. Shulman

Regan A. Shulman, Secretary

This Power of Attorney limits the acts of those named therein to the bonds and undertakings specifically named therein and they have no authority to bind the Company except in the manner and to the extent herein stated.

PLEASE SEND ALL CLAIM INQUIRIES RELATING TO THIS BOND TO THE FOLLOWING ADDRESS:

Arch Insurance - Surety Division
3 Parkway, Suite 1500
Philadelphia, PA 19102



To verify the authenticity of this Power of Attorney, please contact Arch Insurance Company at SuretyAuthentic@archinsurance.com
Please refer to the above named Attorney-in-Fact and the details of the bond to which the power is attached.

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